

COOLEY LLP
 MICHAEL G. RHODES (SBN 116127) (rhodesmg@cooley.com)
 GAVIN L. CHARLSTON (SBN 253899) (gcharlston@cooley.com)
 101 California Street, 5th Floor
 San Francisco, CA 94111-5800
 Telephone: (415) 693-2000
 Facsimile: (415) 693-2222

ANNE H. PECK (SBN 124790) (peckah@cooley.com)
 JEFFREY T. NORBERG (SBN 215087) (jnorberg@cooley.com)
 3000 El Camino Real
 Palo Alto, CA 94306-2155
 Telephone: (650) 843-5000
 Facsimile: (650) 849-7400

Attorneys for Plaintiff
 FACEBOOK, INC.

KATTEN MUCHIN ROSENMAN LLP
 KRISTIN L. HOLLAND (SBN 187314) (kristin.holland@kattenlaw.com)
 2029 Century Park East, Suite 2600
 Los Angeles, CA 90067-3012
 Telephone: 310.788.4400
 Facsimile: 310.788.4471

FLOYD A. MANDELL (admitted *pro hac vice*) (floyd.mandell@kattenlaw.com)
 WILLIAM J. DORSEY (admitted *pro hac vice*) (william.dorsey@kattenlaw.com)
 525 W. Monroe Street
 Chicago, IL 60661-3693
 Telephone: 312.902.5200
 Facsimile: 312.902.1061

Attorneys for Defendants/Counter-Plaintiffs
 VARIOUS, INC., *et al.*

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

FACEBOOK, INC.,

 Plaintiff,

 v.

VARIOUS, INC.; GMCI INTERNET
 OPERATIONS, INC.; TRAFFIC CAT, INC.;
 FRIENDFINDER NETWORKS INC.; and
 DOES 1-100,

 Defendants.

AND RELATED COUNTERCLAIMS

Case No. 4:11-cv-01805-SBA (DMR)

**JOINT STIPULATION FOR STAY and
~~PROPOSED~~ ORDER**

Pursuant to Local Rule 7-12, Plaintiff Facebook, Inc. (“Facebook”) and Defendants Various, Inc., GMCI Internet Operations, Inc., Traffic Cat, Inc. and FriendFinder Networks Inc. (collectively “Defendants”) hereby stipulate that this case be stayed in favor of continued settlement discussions between the parties with the continued assistance, as needed, from Magistrate Judge Jacqueline Scott Corley, which the parties believe are likely to resolve the case.

On November 4, 2011 the parties participated in a full day settlement conference with Magistrate Judge Corley which continued until after 6:00 p.m. and significant progress was made to resolve all disputes. While meaningful progress toward settlement was made, several issues require further discussion. The parties believe that continued discussions between the parties will likely lead to a settlement. It is the parties’ belief that a stay will conserve judicial resources, economy and time. The parties further believe that a stay of the litigation, including the December 30, 2011 deadline to amend pleadings or add parties and any and all other deadlines, will facilitate a settlement. Accordingly, at the suggestion of Magistrate Judge Corley and subject to the approval of the Court, the parties hereby stipulate that:

1. This case is stayed indefinitely in favor of continued settlement discussions under the supervision of Magistrate Judge Corley;
2. The December 30, 2011 deadline to add parties and amend the complaint is vacated and will be reset to a later date should the stay be lifted;
3. All discovery deadlines, including all deadlines for third parties to respond to subpoenas, are vacated and will be reset to a later date should the stay be lifted;
4. Any party may lift the stay by first notifying Magistrate Judge Corley and all other parties and by filing a Notice of Dissolution of Stay five (5) days thereafter; and

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1 5. The January 12, 2012 case management conference will proceed as scheduled should the
2 case not be resolved before that date.

3 **SO STIPULATED:**

4 Dated: November 7, 2011

COOLEY LLP
JEFFREY T. NORBERG (215087)

6 /s/ Jeffrey T. Norberg

Jeffrey T. Norberg (215087)
Attorneys for Plaintiff
FACEBOOK, INC.

8 KATTEN MUCHIN ROSENMAN LLP
9 KRISTIN L. HOLLAND (187314)

10 /s/ Kristin L. Holland

Kristin L. Holland (187314)
Attorneys for Defendants/Counter-Plaintiffs
VARIOUS, INC., et al.

14 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

17 Dated: 11/7/11



The Honorable Saundra Brown Armstrong
United States District Judge

GENERAL ORDER 45 ATTESTATION

In accordance with General Order 45, concurrence in the filing of this document has been obtained from each of the signatories and I shall maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

/s/ Jeffrey T. Norberg

Jeffrey T. Norberg
Attorneys for Plaintiff
FACEBOOK, INC.